

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**CASE NO. 3:20-CV-05955-MAS-LHG**

SEOUL SEMICONDUCTOR CO., LTD., et  
al.

Plaintiffs,

v.

ONYX ENTERPRISES INT'L CORP. d/b/a  
CARiD.COM.

Defendant.

**STIPULATION FOR ENTRY OF CONSENT JUDGMENT  
AND PERMANENT INJUNCTION**

Plaintiffs Seoul Semiconductor Co., Ltd. and Viosys Co., Ltd. (collectively “Seoul”) and PARTS iD, LLC, formerly known as Onyx Enterprises Int’l Corp. d/b/a CariD.com (“PARTS iD”) stipulate to entry of Consent Judgment against PARTS iD and in favor of Seoul on Seoul’s claim of patent infringement, and any potential defenses or counterclaims, including any defense of non-infringement or invalidity. The stipulation is based upon the following:

1. Seoul alleges, and PARTS iD does not contest, that PARTS iD has sold products named in the complaint and in Plaintiffs’ infringement contentions that are covered by the asserted claims of U.S. Patent No. 10,439,105, U.S. Patent No. 9,070,851, U.S. Patent No. 9,520,543, U.S. Patent No. 9,893,240, U.S. Patent No. 9,831,401, U.S. Patent No. 9,859,469; U.S. Patent No. 9,048,409; U.S. Patent No. 9,029,892; U.S.

Patent No. 9,768,367; U.S. Patent No. 7,982,207; U.S. Patent No. 6,942,731; and U.S. Patent No. 9,269,868 (collectively, “the Patents in Suit”) that are owned by Seoul.

2. PARTS iD does not contest that the Patents in Suit are valid.
3. For purposes of resolving this patent dispute, the Parties agree that a Consent Judgment and Permanent Injunction should be entered in favor of Seoul and against PARTS iD on Seoul’s claim of patent infringement of the Patents in Suit.

Accordingly, the Parties stipulate and request that the Court enter the attached Consent Judgment.

We hereby consent to the form and entry of this Judgment:

Dated: May 7, 2021

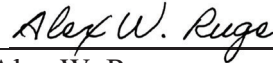
By



MICHAEL EISENBERG  
STEPTOE & JOHNSON LLP  
1114 Avenue of the Americas, 35<sup>th</sup> Fl.  
New York, NY 10036  
[meisenberg@steptoe.com](mailto:meisenberg@steptoe.com)  
(212)-506-3931

*Attorneys for Plaintiffs,  
SEOUL SEMICONDUCTOR CO.,  
LTD., and SEOUL VIOSYS CO., LTD.*

By



Alex W. Ruge  
BRADFORD, LTD  
270 Lawrence Street, Suite 104  
Denver, CO 80205  
[aaron@apb-law.com](mailto:aaron@apb-law.com)  
(303) 325-5467

*Attorneys for Defendant  
ONYX ENTERPRISES INT'L CORP.  
d/b/a CARiD.COM*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**CASE NO. 3:20-CV-05955 MAS-LHG**

SEOUL SEMICONDUCTOR CO., LTD., et  
al.

Plaintiffs,

v.

ONYX ENTERPRISES INT'L CORP. d/b/a  
CARiD.COM,

Defendant.

**CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Plaintiffs Seoul Semiconductor Co., Ltd. and Seoul Viosys Co., Ltd. (collectively, “Seoul”) and PARTS iD, LLC, formerly known as Onyx Enterprises Int’l Corp. d/b/a CariD.com (“PARTS iD”) hereby consents to entry of judgment against PARTS iD and in favor of Seoul, as follows:

1. U.S. Patent No. 10,439,105, U.S. Patent No. 9,070,851, U.S. Patent No. 9,520,543, U.S. Patent No. 9,893,240, U.S. Patent No. 9,831,401, U.S. Patent No. 9,859,469; U.S. Patent No. 9,048,409; U.S. Patent No. 9,029,892; U.S. Patent No. 9,768,367; U.S. Patent No. 7,982,207; U.S. Patent No. 6,942,731; and U.S. Patent No. 9,269,868 (collectively, “the Patents in Suit”) asserted by Seoul in this matter remain valid.
2. PARTS iD has sold products that were manufactured by third parties and have been accused by Seoul in the above-captioned cases. Seoul contends, and PARTS iD does not dispute, that such products infringe one or more of the Patents in Suit.

3. PARTS iD, its officers, agents, servants, attorneys, and other persons who are in active concert or participation with it who are on actual notice hereof by personal service or otherwise are hereby permanently agree to stop making, using, selling, importing or offering for sale in the United States the following products or any mere colorable variations thereof (e.g. same product with different part number) until the last to expire of the Patents in Suit unless such products containing the same patented component or using the same patented process are manufactured using products or processes sourced from Seoul or Seoul Licensees: ARB LED Fog Light 3500890; Audiopipe NL-UD123 White LED; Depo 325-2001LAS Fog Lights; Firewire Heavy Duty LED Strip; Heise HE-W135 White LED Strip; Install Bay IBLED-1MPP LED Strip; Keep it Clean KICLEDTAPWT White LED Strip; LUMEN 86-1001002 daytime running light; LUMEN LED Fog Light 9006HLC-G10; LUMEN LED Headlight Conversion Kit H4XXHLC-G10; Metra MPS-RGBDL LED Dome Light; Oracle Lighting 3802-001 12" Interior White LED Strip; ORACLE ORL5415-001 DRL Flexible Strips; Race Sport LED Conversion Bulb RSPNP5205; Race Sport RS-5050-9DOME-W LED Dome Panel; and Rugged Ridge 12430.01 White LED Light.
4. The Parties shall bear their own costs, expenses and attorneys' fees.
5. This Court retains exclusive jurisdiction to enforce this Consent Judgment. and Permanent Injunction.

Dated this May 14, 2021

MA Shapp  
United States District Judge